

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
JOSEPH ROSEMOND,)	
Plaintiff,)	
v.)	C.A. No. 04-30072-KPN
)	
STOP AND SHOP SUPERMARKET)	
COMPANY,)	
Defendant.)	
_____)	

**DEFENDANT'S MOTION TO EXTEND ITS TIME TO OPPOSE PLAINTIFF'S
MOTION TO AMEND THE COMPLAINT.**

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7(b), Defendant The Stop & Shop Supermarket Company LLC ("Stop & Shop") hereby moves this Court to extend its time to file an opposition to the motion of Plaintiff Joseph Rosemond's motion to amend the complaint from June 7, 2006 to June 15, 2006. As grounds for this motion, Stop & Shop states that it needs this additional time to gather the information necessary to establish that Rosemond cannot prevail on his proposed retaliation claim and prepare its opposition.

WHEREFORE, Defendant Stop & Shop respectfully requests that this Court extend its time to oppose Plaintiff's Motion to Amend from June 6, 2006 to June 16, 2006.

Respectfully submitted,

The Stop & Shop Supermarket Company LLC

By its attorneys,

/s/ Brigitte M. Duffy
Lisa J. Damon (BBO # 558843)
Brigitte M. Duffy (BBO # 567724)
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Dated: June 6, 2006

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), I hereby certify that I, Brigitte Duffy, contacted counsel for Plaintiff, Tani Sapirstein to in a good faith attempt to resolve or narrow the issue(s) raised in the instant Motion.

/s/ Brigitte Duffy

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper will be sent to those indicated as not registered participants on June 6, 2006.

/s/ Brigitte Duffy